



Squire Patton Boggs (US) LLP  
1211 Avenue of the Americas, 26<sup>th</sup> Floor  
New York, New York 10036

O +1 212 872 9800  
F +1 212 872 9815  
squirepattonboggs.com

Franklin G. Monsour, Jr.  
T +1 212 872 9825  
franklin.monsour@squirepb.com

June 10, 2021

**BY ECF**

Honorable Madeline Cox Arleo, *U.S.D.J.*  
United States District Court  
District of New Jersey  
Martin Luther King Building  
& U.S. Courthouse  
Newark, N.J. 07101

**United States of America v. Bakhshi, 2:18-cr-000735-MCA-4  
Request to Amend Motion Schedule**

Hon. Madeline Cox Arleo:

This law firm represents defendant Pavandeep Bakhshi in the above-referenced criminal action. We write in response to the letter filed by defendant Paul Parmar requesting with the Government's consent an extension of time to file his reply on pre-trial motions from June 10, 2021 to June 17, 2021 [Dkt. 113].

If the Court is inclined to grant the extension, we write to respectfully request that the same deadline be applied to Mr. Bakhshi to keep the defendants' replies on their pre-trial motions on the same schedule. The Government consents to Mr. Bakhshi's request herein.

Respectfully submitted,

Squire Patton Boggs (US) LLP

/s/ Franklin G. Monsour, Jr.

Franklin G. Monsour, Jr.

cc: counsel of record (via ECF)